EXHIBIT C

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May 8, 2012

VIA ELECTRONIC MAIL

Emily Johnson Henn, Esq.
Covington & Burling LLP
333 Twin Dolphin Drive
Suite 700
Redwood Shores, CA 94065-1418

> **Re:**   *In re: High-Tech Employee Antitrust Litigation,*
> **Master Dkt. No. 11-cv-2509 (N.D. Cal.)**

Dear Ms. Henn:

I write on behalf of Plaintiffs in the above-captioned matter in response to Pixar Animation Studio's ("Pixar") production of data at bates ranges PIX00005969-PIX00005984.

First, please let us know by tomorrow, May 9, 2012, whether Pixar has finished producing data responsive to Plaintiffs' requests, and if not, by what date Pixar's data production will be complete. Please note that Exhibit 1 to this letter lists categories of data that have not been produced and that were included in Plaintiffs' requests for production. Given the fast-approaching class certification deadlines, it is imperative that Pixar produce all relevant data immediately.

Second, Exhibit 1 contains a list of questions concerning Pixar's data. Given the nature and scope of Plaintiffs' questions, Plaintiffs believe that the most productive way to address these questions would be through a teleconference involving Plaintiffs' counsel, a staff member of Plaintiffs' consulting expert, and a representative of Pixar who is knowledgeable about the data produced by Pixar. Please propose a time this week or next week when Pixar will make available a person knowledgeable about the data produced in this litigation for such a teleconference.

Emily Johnson Henn, Esq.
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Thank you, and please feel free to contact me with any questions.

Sincerely,

Daniel J. Walker

cc: Dean Harvey

Enclosure

Exhibit 1 to May 8, 2012 Walker Letter

I.   **Employee Data Questions & Issues Relating to PIX00005973-PIX00005977.**

A.   Does the data include employee-level information for all employees that were active between 2001 and the present regardless of whether their status never changed? If not, please provide employee level data for all employees active during the Relevant Period that was not included in this production.

B.   Please explain what the following fields represent:

    1.   "FLSA Stat" in PIX00005977

    2.   "Number" in PIX00005974 and PIX 00005975

C.   In PIX 00005974 and PIX00005975, please explain the following values for the field "ID":

    1.   BOARD1

    2.   BOARD2

    3.   BOARD3

    4.   BOARD4

    5.   BOARD5

    6.   BOARD6

    7.   x6561

    8.   99999

D.   In PIX00005977, please explain how to assign stock options and restricted stock awards to individual employees.

E.   What do the following values in the field "Education" represent:

    1.   ANNUAL

    2.   OTHER

    3.   RANKING

    4.   WRAP

F.   Please explain why the following fields have missing values, and please provide replacement data if the missing values were generated by accident:

    1.   NID Hashed

Exhibit 1 to May 8, 2012 Walker Letter

2. Education

3. School Name

4. College Major

G.   Please provide the following additional information or explain how it can be determined from the information provided:

1. Whether an employee is salaried or not

2. Employee evaluations data

3. Hire date

4. Previous employer

5. Compensation at previous employer

6. Channel of hiring

7. Benefits

H.   Please confirm that the "ID" field is the same across all files and can be used to cross reference employee information from different sources.

I.   Does the amount in "Annual_Rt" reflect only the base salary or does it include bonus amounts as well?

J.   Do the observations in PIX00005973 correspond with the observations in PIX00005977 where the field "Action" equals "Award-Monetary"?   If yes, explain why there are 1,022 observations where the field "Action" equal "Award-Monetary" but 10,442 observations in the bonus data file PIX00005973.

K.   What do negative bonus amount in file PIX00005973 represent?

II.   **Hiring and Recruiting Data Questions Relating to PIX-00005969-PIX00005972; PIX00005978; and PIX00005983.**

A.   Please explain what the following fields represent in file PIX00005969:

1. Date 2

2. Date

3. ROP

4. To

2

Exhibit 1 to May 8, 2012 Walker Letter

B.   Please provide the following additional fields for the files PIX00005972, PIX00005978, and PIX00005983:

    1. Current employer

    2. Salary at current employer

    3. Hire date

    4. Starting salary

    5. How applicant was contacted (*e.g.*, cold called, applicant submitted application from job posting, etc.)

C.   Please provide the following additional fields for the file PIX00005960:

    1. Applicant ID

    2. Salary at current employer

    3. Starting Salary

    4. How application was contacted (e.g., cold called, applicant submitted application from job posting, etc.)

D.   Please provide the following additional fields for the files PIX00005970 and PIX00005971:

    1. Applicant ID

    2. Hire date

    3. Salary at current employer

    4. How applicant was contacted (e.g., cold called, applicant submitted application from job posting, etc.)

E.   Do the datasets PIX00005970 and PIX00005971 contain information about some of the same applicants? If so, please provide applicant ID fields for each created in such a manner that an individual is uniquely identified across the datasets. Alternatively, please explain how these files can be combined in their present form.

F.   Please provide detailed cold calling information for the Relevant Period broken down by:

    1. Cold callee's employer at time of contact

    2. Position recruited for

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3. Cold callee's education (e.g., engineering undergraduate, engineering graduate degree, MBA, etc.)

4. Cold callee's position at time of contact

5. Cold callee's salary history

6. Cold callee's years of experience

7. Outcome (e.g., not interested, requested additional information, submitted resume, hired, rejected, etc.)